

**REMARKS**

Claims 1-15 and 17-19 are pending in this application. Claim 16 is canceled. By this Amendment, claim 15 is amended to address the teaching of Rousseau.

The courtesies extended to Applicant's representative by Examiners Tran and Shah at the interview held on January 11, 2006, are appreciated. The reasons presented at the interview as warranting favorable action are incorporated into the remarks below and constitute Applicant's record of the interview.

In view of the foregoing amendments and following remarks, reconsideration of this application is respectfully requested.

**I. Allowable Subject Matter**

Applicant notes with appreciation that claims 6-8 and 13-14 were indicated to be allowable.

**II. Rejection Under 35 U.S.C. §102(b)**

Claims 15-19 were rejected under 35 U.S.C. §102(b) as allegedly being anticipated by U.S. Patent No. 6,068,372 ("Rousseau"). This rejection is respectfully traversed.

Claim 15 as amended, recites a drum maintenance unit that includes a positioning mechanism that properly positions the drum maintenance unit to a media device and provides electrical contact with the media device when the drum maintenance unit is installed in the media device, wherein the positioning mechanism provides a signal to the media device when the drum maintenance unit is properly installed in the media device.

Claim 17 recites a method of installing a drum maintenance unit in a media device that includes releasably securing the drum maintenance unit to the media device in a desired position and simultaneously providing an electrical connection between the drum maintenance unit and the media device.

Rousseau teaches a replaceable cassette that utilizes a liquid application system to apply a liquid intermediate transfer surface to a support surface in an offset ink jet printer. See Rousseau, column 5, lines 35-38. Rousseau further teaches that the cassette includes a removable waste ink receptacle for collecting waste ink from the print head in a printer and/or a removable cartridge containing a liquid impregnated arcuate surface for applying the intermediate liquid transfer surface to the support surface in the printer.

The Patent Office alleges that Rousseau teaches the positioning mechanism as recited in claim 15, citing column 10, lines 29-42 of Rousseau. However, such characterization is incorrect. As discussed during the interview, at column 10, lines 29-42, Rousseau teaches a life status assembly 120 having a circuit board in a removable plastic receptacle that is seated within the cassette 12 underneath the removable waste ink tray 16. Rousseau further teaches that the circuit board is electrically connected to the printer 10 when the cassette 12 is fully inserted in the printer and includes an internal counter that is decremented as prints are made. In addition, Rousseau teaches that when the counter reaches a predetermined value to indicate a low oil condition in the oil-impregnated roller 20, the printer generates a message on the display panel 11 that advises the operator to replace the cartridge 22. Thus, Rousseau merely teaches a counter mechanism to monitor the life status of the cartridge 22 rather than a positioning mechanism as recited in claim 15.

Furthermore, although Rousseau teaches a positioning mechanism to fully insert the replaceable cassette in the printer, nowhere does Rousseau teach or suggest that the positioning mechanism provides a signal to the media device when the drum maintenance unit is properly installed in the media device as recited in claim 15. Thus, a drum maintenance unit having a positioning mechanism as recited in claim 15 distinguishes over Rousseau.

Moreover, a method of installing a drum maintenance unit in a media device as recited in claim 17 distinguishes over Rousseau because nowhere does Rousseau teach or suggest releasably securing the drum maintenance unit to the media device in a desired position and simultaneously providing an electrical connection between the drum maintenance unit and the media device as recited in claim 17.

For the foregoing reasons, Applicant respectfully submits that Rousseau fails to anticipate the subject matter of claims 15 and 17, and the claims dependent therefrom. Reconsideration and withdrawal of this rejection are respectfully requested.

### **III. Rejection Under 35 U.S.C. §103(a)**

Claims 1-5 and 9-12 were rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over U.S. Patent No. 5,808,645 ("Reeves") in view of U.S. Patent No. 6,428,225 ("Nguyen"). This rejection is respectfully traversed.

Claim 1 recites a drum maintenance unit having a latching mechanism that releasably secures the drum maintenance unit to a media device and provides electrical connection with the media device when the drum maintenance unit is installed in the media device.

Reeves teaches a transfer drum maintenance system such as a replaceable cartridge that applies an intermediate transfer layer, in the form of a liquid layer, onto the transfer drum support surface, removes any untransferred ink or other debris from the support surface, and collects waste or purged ink in a removable and replaceable or reusable receptacle. See Reeves, column 2, lines 40-53.

The Patent Office alleges that Reeves teaches a latching mechanism as recited in claim 1 in Figure 5 and at column 4, lines 54-67 of Reeves. However, as discussed during the interview, nowhere does Reeves teach or suggest a drum maintenance unit having a latching mechanism that releasably secures the drum maintenance unit to a media device and provides

electrical contact with the media device when the drum maintenance unit is installed in the media device. In addition, at column 4, lines 54-67, Reeves merely describes Figure 2 with no mention of a drum maintenance unit having a latching mechanism as recited in claim 1. Figure 5 of Reeves is an illustration of the drum maintenance cartridge, the transfer drum and the print head with the wick assembly for applying liquid to the transfer drum in a lower position in the drum maintenance cartridge showing the relative positioning of the drum maintenance cartridge, the transfer drum and the print head. Figure 5 does not illustrate a drum maintenance unit as recited in claim 1. Thus, Reeves does not teach or suggest a drum maintenance unit having a latching mechanism as recited in claim 1.

The Patent Office relied on Nguyen as allegedly teaching the latching mechanism and a recess formed in a portion of one of the drum maintenance unit and a media device and a corresponding member on the other of the drum maintenance unit and the media device. However, even if Reeves were to have been combined with Nguyen as alleged by the Patent Office, the presently claimed subject matter still would not have been achieved because Nguyen does not remedy the deficiencies of Reeves. Specifically, Nguyen also does not teach or suggest a drum maintenance unit having a latching mechanism that provides electrical contact with the media device when the drum maintenance unit is installed in the media device as recited in claim 1.

Thus, neither Reeves nor Nguyen would have led one of ordinary skill in the art to employ a latching mechanism to both secure a drum maintenance unit to a media device and to provide electrical contact between the drum maintenance unit and the media device.

Furthermore, during the interview, the Patent Office raised the prospect that claims 1-5 and 9-12 may be rejected under 35 U.S.C. §103(a) as allegedly being unpatentable over Rousseau in view of Nguyen. Applicant respectfully disagrees.

Rousseau does not teach or suggest a latching mechanism that releasably secures the drum maintenance unit to a media device and provides electrical contact with the media device when the drum maintenance unit is installed in the media device as recited in claim 1. The Patent Office, however, suggested that it could rely on Nguyen as allegedly teach the latching mechanism as recited in claim 1. However, as discussed above, nowhere does Nguyen teach or suggest a latch mechanism that provides electrical contact with the media when the drum maintenance unit is installed in the media device as recited in claim 1.

According to MPEP §2143.01, obviousness can only be established by combining or modifying the teachings of the prior art to produce the claimed invention if there is some teaching, suggestion, or motivation to do so found either explicitly or implicitly in the references themselves or in the knowledge generally available to one of ordinary skill in the art. In this case, as discussed above, neither Rousseau nor Nguyen teaches any motivation to combine the two references or otherwise derive the claimed invention as each reference lacks the features recited in claim 1. As such, the teachings of Rousseau and Nguyen would not be sufficient for one of ordinary skill in the art to make the proposed combination. Thus, the combination of Rousseau and Nguyen also would not have led one of ordinary skill in the art to claim 1 and claims dependent therefrom.

For the foregoing reasons, Applicant respectfully submits that Reeves and Nguyen, alone or in combination, or Rousseau and Nguyen, alone or in combination, would not have led one of ordinary skill in the art to claims 1-5 and 9-12.

Reconsideration and withdrawal of this rejection are respectfully requested.

**IV. Conclusion**

In view of the foregoing, it is respectfully submitted that this application is in condition for allowance. Favorable consideration and prompt allowance of claims 1-15 and 17-19 are earnestly solicited.

Should the Examiner believe that anything further would be desirable in order to place this application in even better condition for allowance, the Examiner is invited to contact the undersigned at the telephone number set forth below.

Respectfully submitted,



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